

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**

Norfolk Division

UNITED STATES OF AMERICA

v.

CRIMINAL NO.: 4:17cr52-1

MARTIN L. HUNT, et al.

**JOINT MOTION FOR ADDITIONAL
PEREMPTORY CHALLENGES**

COMES NOW the Defendants, Martin L. Hunt, Xavier Greene, Deshaun Richardson, Ryan Taybron, Eric Nixon, Geovanni Douglas, and Raymond Palmer, through counsel, and moves the Court to grant the defense additional peremptory challenges. This motion is made pursuant to Federal Rule of Criminal Procedure 24. The reasons in support of this motion are set forth below:

This case involves a complex multi-defendant conspiracy. The indictment has allegations of multiple murders, attempted murders, robberies, felonious assaults, firearm offenses and drug trafficking by a multitude of individuals. All seven Defendants are being tried jointly and the trial is expected to involve more than 100 witnesses and last numerous weeks. Three Defendants are facing mandatory life sentences if convicted of the most serious charges and all Defendants face either a life sentence or decades of incarceration.

The Court has discretion under Rule 24 of the Federal Rules of Criminal Procedure to grant additional peremptory challenges. The Sixth Amendment requirement that a

defendant be afforded a fair trial by an impartial jury is “fundamental to the American system of justice” *Taylor v. Louisiana*, 419 U.S. 522, 530 (1975). The primary purpose of peremptory challenges is to help “secure the constitutional guarantee of trial by an impartial jury” *United States v. Martinez-Salazar*, 528 U.S. 304, 316 (2000).

The seven Defendants are represented by a total of 10 attorneys and each Defendant has different defense and strategies about what type of jurors may be best for a case of this nature. The defense requests that the Court grant to the defense a total of 50 peremptory challenges which is far less than the 10 each Defendant would have if being tried individually. This number of challenges will insure that each Defendant has a reasonable opportunity to exercise challenges to get a fair and impartial jury.

This motion is in compliance with the local Rules for the Eastern District of Virginia in that it is filed more than 21 days prior to trial.

Respectfully submitted,

MARTIN L. HUNT

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CERTIFICATE OF SERVICE

I hereby certify that on this 13th day of September 2019, I served a true copy of the foregoing via the CM/ECF System, which will send a notification of such filing (NEF) to all counsel of record, including:

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